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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

PACIFIC OFFICE AUTOMATION INC., an
Oregon corporation,

Plaintiff,

v.

PITNEY BOWES INC., a Delaware
corporation; PITNEY BOWES GLOBAL
FINANCIAL SERVICES LLC, a Delaware
limited liability company; THE PITNEY
BOWES BANK, INC., a federal banking
institution; and WHEELER FINANCIAL
FROM PITNEY BOWES INC., a Delaware
corporation,

Defendants.

Case No. 3:20-cv-00651-AC

**DEFENDANTS' UNOPPOSED
MOTION TO CHANGE TWO CASE
DEADLINES**

LR 7-1 CERTIFICATION

The undersigned counsel for defendants certifies that he conferred with counsel for plaintiff on changing the two deadlines that are the subject of this motion, and plaintiff does not oppose this motion.

MOTION

Defendants move the Court for an Order giving the parties until September 8, 2021 to (1) file their Joint ADR Report; and (2) to request a Rule 16 conference to ask Court to pick between Option 1 and Option 2 as set forth in the parties' October 1, 2020 Joint Status Report (ECF No. 30), if parties are unable to agree that expert disclosures and summary judgment should be bifurcated.

MEMORANDUM IN SUPPORT OF MOTION

Due to the demands of this case and other scheduling issues, the parties are still taking depositions by agreement and have not had an opportunity to have a meaningful discussion about possible ADR or on bifurcation with respect to motions for summary judgment and expert disclosures, the possibility of which was outlined in ECF No. 30.¹ The parties anticipate that they will be able to do so in the next 60 days and hence request this extension.

The parties also received an Order from the Court today setting a Rule 16 Conference for July 21, 2021 (Doc. 57). POA wishes to keep that Rule 16 Conference on the Court's calendar, as there is a disagreement over the deadline for remaining fact discovery (other than certain

¹ Per this Court's Order in Doc. 31, the original deadline for making this request was May 7, 2021, the same as the deadline for submitting the Joint ADR Report. This Court's Order in Doc. 52 did not specifically reference this deadline but extended all the other case deadlines by 60 days, thereby in effect making the new deadline for making this request July 6, 2021.

agreed-to depositions), and PBI does not object to addressing this in the Conference. The parties will confer and advise the Court in advance of the July 21, 2021 Rule 16 Conference of the issues they wish to discuss at the Conference.

DATED this 6th day of July, 2021.

K&L GATES LLP

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Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 2021, I caused to be served a copy of the foregoing DEFENDANT'S UNOPPOSED MOTION TO CHANGE TWO CASE DEADLINES upon all counsel of record via the Court's CM/ECF electronic service system.

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DATED this 6th day of July, 2021.

s/Philip Van Der Weele

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